

March 1, 2012

The Honorable Julius Genachowski, Chairman  
Federal Communications Commission  
445 12th Street, S.W. Room 86201  
Washington, D.C. 20554

**RE: FCC IB 11-109; LightSquared application request for Modification of its Authority for Ancillary Terrestrial Component [FCC File No. SAT-MOD-20101118-00239]**

Dear Chairman Genachowski:

Boaters rely on their GPS enabled devices to navigate safely. Such navigation devices should not be made dangerously unreliable by allowing the spectrum use sought by Lightsquared. The Commission should not approve commercial terrestrial operations or other operations that would cause harmful interference to Global Positioning System devices.

For these reasons, the National Marine Manufacturers Association (NMMA) supports the Federal Communication Commission's (FCC) actions proposed on February 15, 2012 that would issue a vacature of the *Conditional Waiver Order* for LightSquared's application for Modification of its Authority for Ancillary Terrestrial Component [FCC File No. SAT-MOD-20101118-00239]; and would suspend indefinitely LightSquared's underlying ATC authorization, first granted in 2004.

NMMA is the nation's leading recreational marine industry association, representing nearly 1,300 boat builders, engine manufacturers, and marine accessory manufacturers. NMMA members collectively produce more than 80 percent of all recreational marine products made in the United States. With nearly 13 million registered boats (and nearly 16.67 million boats in use) and 75 million boaters nationwide, the recreational marine industry is a major consumer goods and services industry that contributed \$30.4 billion in new retail sales and services to the U.S. economy in 2010 and generates 354,000 jobs nationwide.

Respectfully submitted,



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Chief Counsel and Director of Regulatory Affairs  
Government Relations

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